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December 6, 2023

VIA ECF

Hon. Katharine H. Parker, MJ
United States District Court, SDNY
500 Pearl Street
New York, NY 10007

RE: 23cv 437 Rambert v. Silvercup Scaffolding I LLC
Fourth Request for Extension of Cheeks motion d

Request GRANTED. The parties shall submit the settlement agreement for the Court's review within five (5) business days of Defendant's receipt of the lien search results. The parties shall submit a joint status letter to provide an update on the status of the lien search by **January 2, 2024**

SO ORDERED:


HON. KATHARINE H. PARKER
UNITED STATES MAGISTRATE JUDGE 12/7/2023

Dear Judge Parker:

As the Court is aware, I represent Plaintiff Carlton Rambert in the above referenced matter where Plaintiff has made both wage and hour and discrimination allegations. The parties' *Cheeks* motion is due on December 8, 2023. *Cheeks v. Freeport Pancake House, Inc.*, 796 F.3d 199 (2d Cir. 2015) I write with Defendants' consent to respectfully request an additional extension of time to submit the wage and hour settlement agreement for the Court's review. The Defendants require additional time to complete a lien search.

While the parties are hopeful that the lien search will be completed and receive the results within a reasonable time, the government agency's time frame is uncertain. Instead of requesting any further extensions to an interim deadline and in the interest of judicial economy and efficiency, the parties request an extension to submit their Cheeks motion within five (5) business days of Defendants' receipt of the requested lien search information. This is the parties' fourth request for an extension of the Cheeks motion deadline. Thank you.

Respectfully submitted,

/s/ Susan Ghim

Susan Ghim, Of Counsel